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**MAR 10 1998**

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Federal Communications Commission  
Office of Secretary

*Building The  
Wireless Future™*

**CTIA**

Cellular  
Telecommunications  
Industry Association  
1250 Connecticut  
Avenue, N.W.  
Suite 200  
Washington, D.C. 20036  
202-785-0081 Telephone  
202-785-0721 Fax

March 10, 1998

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW Room 222  
Washington DC 20554

**Re: Ex Parte Presentation**  
CC Docket # 94-102 (E9-1-1)

Dear Ms. Salas:

On Wednesday, March 4, 1998, Edward Hall, Assistant Vice President for Technology and Network Operations of the Cellular Telecommunications Industry Association ("CTIA"), submitted the enclosed letter and its attachments to John Cimko, Chief, Policy Division, Wireless Telecommunications Bureau, Nancy Boocker, Deputy Chief, Wireless Telecommunications Bureau and Dan Phythyon, Chief, Wireless Telecommunications Bureau, concerning the above-referenced proceeding.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter and its attachments are being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

*Cleveland Lawrence III*  
Cleveland Lawrence III

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**Federal Communications Commission  
Office of Secretary**

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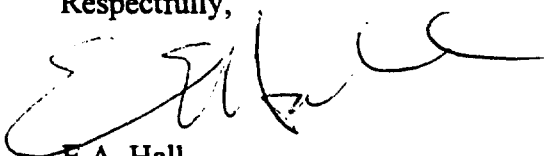
Mr. John Cimko  
Chief  
Policy Division  
Federal Communications Commission  
2025 M Street, N.W.  
Room 7002  
Washington, DC 20554

Dear Mr. Cimko:

Enclosed please find copies of letters addressed to three TTY manufacturers. It was the consensus of the members at the last TTY Forum that a communication be sent to all TTY manufacturers urging their attendance and support at all future TTY Forum meetings suggesting that a solution cannot be reached without their active participation. It was further agreed that a copy be forwarded to your bureau for information purposes only.

Should you have any questions please contact me at 202 736-2359

Respectfully,



E.A. Hall  
CTIA  
AVP for Technology and Network Operations

cc. Dan Phythyon  
Nancy Boocker

March 4, 1998

Ms. Nancy Boocker  
Deputy Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W.  
Room 5002  
Washington, DC 20554

Dear Ms. Boocker:

Enclosed please find copies of letters addressed to three TTY manufacturers. It was the consensus of the members at the last TTY Forum that a communication be sent to all TTY manufacturers urging their attendance and support at all future TTY Forum meetings suggesting that a solution cannot be reached without their active participation. It was further agreed that a copy be forwarded to your bureau for information purposes only.

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Respectfully,



E.A. Hall

CTIA

AVP for Technology and Network Operations

cc. Dan Phythyon  
John Cimko

March 4, 1998

Mr. Dan Phythyon  
Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W.  
Room 5002  
Washington, DC 20554

Dear Mr. Phythyon:

Enclosed please find copies of letters addressed to three TTY manufacturers. It was the consensus of the members at the last TTY Forum that a communication be sent to all TTY manufacturers urging their attendance and support at all future TTY Forum meetings suggesting that a solution cannot be reached without their active participation. It was further agreed that a copy be forwarded to your bureau for information purposes only.

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Respectfully,

A handwritten signature in black ink, appearing to read 'E.A. Hall', with a large, sweeping initial 'E'.

E.A. Hall

CTIA

AVP for Technology and Network Operations

cc. Nancy Boocker  
John Cimko

February 18, 1998

Mr. Sidney Ander  
Executive Vice President  
Krown Manufacturing, Inc.  
3115 Lackland Road  
Fort Worth, TX 76116

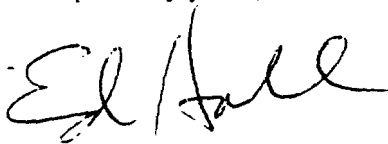
Dear Mr Ander,

We are writing to express our serious concern with the lack of participation of the TTY manufacturing community in the third forum on digital wireless phone/TTY compatibility. As you are aware, the purpose of these forums is to facilitate discussion and identify solutions to meet the Federal Communications Commission's October 1998 E911-TTY compatibility requirements. TTY-3 was held on February 11 and 12 at Gallaudet University, and was hosted by the Cellular Telecommunications Industry Association (CTIA) and the Personal Communications Industry Association (PCIA). The forum was well represented by wireless operators, wireless manufacturers, consumer advocates, and public safety representatives, however no TTY manufacturers attended the conference.

Successfully implementing the E911-TTY compatibility requirement requires a two-part solution. Both the manufacturers of telecommunications equipment and the manufacturers of text telephones must share the burden of ensuring compatibility with each other's products. As the industry has experienced with the wireless Hearing Aid Compatibility ("HAC") issue, if there are two products which have inherent problems operating together, the responsibility to resolve the problem should be shared between the two parties. In this case, FCC involvement was useful in bringing the hearing aid manufacturers and wireless phone manufacturers together.

Wireless manufacturers and operators are accustomed to regulatory oversight by the FCC, and understand the importance of complying with Commission mandates. However, we recognize that TTY manufacturers do not share the same historical experience with the Commission. We believe that under the new federal guidelines (Section 255 of the Telecommunications Act), TTY (CPE) manufacturers have a legal obligation to make their equipment accessible and/or compatible with other commonly used telecommunication equipment. Therefore, while TTY manufacturers do not fall under regulatory obligation under the E911 rules, TTY manufactures should be expected to participate in the E911 activities because of their obligations under Section 255. If we are to meet the requirement of passing TTY emergency calls over digital wireless phones, your participation is critical. The fourth TTY/digital wireless compatibility forum will be held on April 1st and 2nd in the Washington, D.C. area. Please contact Janette Stout at (202) 736-3224 for further information. We look forward to working with you in the months ahead.

Respectfully yours,



Ed Hall  
CTIA

Mary Madigan  
PCIA

February 18, 1998

Mr. Ron Schultz  
Vice President for Quality & Compliance  
Ultratec  
450 Science Drive  
Madison, WI 98033


Dear Ron,

We are writing to express our serious concern with the lack of participation of the TTY manufacturing community in the third forum on digital wireless phone/TTY compatibility. As you are aware, the purpose of these forums is to facilitate discussion and identify solutions to meet the Federal Communications Commission's October 1998 E911-TTY compatibility requirements. TTY-3 was held on February 11 and 12 at Gallaudet University, and was hosted by the Cellular Telecommunications Industry Association (CTIA) and the Personal Communications Industry Association (PCIA). The forum was well represented by wireless operators, wireless manufacturers, consumer advocates, and public safety representatives, however no TTY manufacturers attended the conference.

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Respectfully yours,



Ed Hall  
CTIA

Mary Madigan  
PCIA

February 18, 1998

Mr. George Cheung  
Ameriphone  
12082 Western Avenue  
Garden Grove, CA 92641-2990

Dear Mr. Cheung,

We are writing to express our serious concern with the lack of participation of the TTY manufacturing community in the third forum on digital wireless phone/TTY compatibility. As you are aware, the purpose of these forums is to facilitate discussion and identify solutions to meet the Federal Communications Commission's October 1998 E911-TTY compatibility requirements. TTY-3 was held on February 11 and 12 at Gallaudet University, and was hosted by the Cellular Telecommunications Industry Association (CTIA) and the Personal Communications Industry Association (PCIA). The forum was well represented by wireless operators, wireless manufacturers, consumer advocates, and public safety representatives, however no TTY manufacturers attended the conference.

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Respectfully yours,



Ed Hall  
CTIA

Mary Madigan  
PCIA